

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	Criminal No.
)	03-10234-MLW
v.)	
)	
JOHN GILLIES,)	
a/k/a "Robert Burgess," and)	
a/k/a "David Martino",)	
BEN SILVER,)	
a/k/a " Matthew C. Long", and)	
JOSHUA GOLDSMITH,)	
)	
Defendants.		

GOVERNMENT'S MOTION TO CONTINUE DATE TO
RESPOND TO DEFENDANT GOLDSMITH'S MOTION TO SUPPRESS
(ASSENTED TO)

The United States of America, by its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully moves the Court for a three-week extension of time in which to respond to the Motion to Suppress filed by defendant Joshua Goldsmith. The government's response is due on April 1, 2005, and the government requests that the Court extend this time to April 22, 2005.

As grounds for this motion, the government represents that the defendant has advised the government that he is still considering whether or not to go forward with the motion. If the defendant concludes he does not, this obviates the need for the government to respond. The government believes that an additional three week period of time will enable the defendant to communicate with the government as to his intentions, as well as to provide the government with sufficient time to respond, should

the defendant decide to go forward.

Counsel for defendant Goldsmith has assented to the additional three week period.

WHEREFORE, the United States respectfully requests that the Court continue the time it needs to respond to defendant Goldsmith's motion to and including April 22, 2005.

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Susan M. Poswistilo
SUSAN M. POSWISTILO
Assistant U.S. Attorney